

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DAVID MACK, and)	
CHRISTOPHER MACK, on behalf of)	1:10-cv-4244
themselves and others similarly situated,)	
Plaintiffs,)	Judge Hibbler
v.)	Magistrate Judge Keys
)	
MRS ASSOCIATES, INC.,)	JURY TRIAL DEMANDED
Defendant.)	

PARTIES' PROPOSED DISCOVERY PLAN

The parties hereby jointly submit the following proposed discovery plan:

Rule 26(a)(1) disclosures: October 1, 2010.

Amendments of pleadings: January 28, 2011.

Close of fact discovery: May 27, 2011.

Rule 26(a)(2) Expert Report Disclosure Schedule:

Last permissible date for disclosure of party
with burden of proof as to expert issues presented: June 30, 2011;

Response: 45 days after service of initial 26(a)(2) disclosure;

Rebuttal: 30 days after service of response.

Respectfully submitted,

/s/Alexander H. Burke
Counsel for Plaintiff

/s/James C. Vlahakis (with consent)
Counsel for Defendant

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